

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Technology Transitions Policy Task)	GN Docket No. 13-5
Force)	

Comments of ADTRAN, Inc.

ADTRAN, Inc. (“ADTRAN”) hereby briefly addresses some of the questions asked by the Technology Transitions Task Force (“Task Force”) with regard to potential real-world trials to obtain data that should be helpful to the Commission with regard to the evolution to all-IP networks.¹ As explained below, ADTRAN urges the Commission to allow such trials to commence expeditiously so that the industry and the regulators can gain valuable information as soon as possible. In addition, ADTRAN believes that the Commission should allow holistic trials, because they are likely to produce the greatest insight to guide the transition to all-IP networks.

ADTRAN, founded in 1986 and headquartered in Huntsville, Alabama, is a leading global manufacturer of networking and communications equipment, with an innovative portfolio of solutions for use in the last mile of today’s telecommunications networks. ADTRAN’s equipment is deployed by some of the world’s largest service providers, as well as distributed enterprises and small and medium businesses. Importantly for purposes of this proceeding, ADTRAN solutions enable voice, data, video and Internet communications across copper, fiber

¹ *Technology Transitions Policy Task Force Seeks Comment on Potential Trials*, Public Notice, DA 13-1016, released May 10, 2013 (hereafter cited as “*Public Notice*”).

and wireless network infrastructures. ADTRAN thus brings an expansive perspective to this discussion of the evolution to all-IP networks.

ADTRAN generally supports the Task Force suggestion in the *Public Notice* of moving forward with real-world trials. ADTRAN previously filed favorable comments in response to AT&T's petition to conduct trials to better inform the Commission with regard to the transition from the circuit switched, voice centric network to all-IP networks.² In those comments, ADTRAN urged to Commission to allow such limited trials proposed by AT&T, because the knowledge gained from those experiments would likely be much more valuable than simply relying on the advocacy of interested parties.³ Moreover, using the experiences gained from such field trials would also be consistent with the Administration's policy of having agencies base their regulations on the best available information.⁴

ADTRAN is somewhat concerned, however, because the *Public Notice* appears to endorse a series of narrow, single purpose trials. The *Public Notice* seeks comment on three types of trials – one that would examine VoIP interconnection, one that would examine Public

² *Public Notice*, "Pleading Cycle Established on AT&T and NTCA Petitions," GN Docket No. 12-353, DA 12-1999, released December 14, 2012.

³ ADTRAN Comments in GN Docket No. 12-353, filed January 28, 2013, at p. 6.

⁴ *Cf.*, *Memorandum for the Heads of Executive Departments and Agencies*, "Principles for Regulation and Oversight of Emerging Technologies," March 11, 2011 (available at <http://www.whitehouse.gov/sites/default/files/omb/inforeg/for-agencies/Principles-for-Regulation-and-Oversight-of-Emerging-Technologies-new.pdf>):

Decisions should be based on the best reasonably obtainable scientific, technical, economic, and other information, within the boundaries of the authorities and mandates of each agency.

Safety/NG911, and one that would examine wireline to wireless technologies.⁵ While such field trials may reveal some information on those specific technology conversion issues, ADTRAN is concerned that such single-purpose trials will not identify potential issues concerning the complex interaction of multiple technology changes that will be occurring to various interconnected systems at the same time.

By way of example, a trial examining NG911 interconnections between the incumbent carrier and the local public safety agencies, and a separate trial examining IP interconnections between the incumbent carrier and competitive carriers might not reveal glitches with competitive carrier customers' calls to NG911 systems. ADTRAN thus believes it is important for the Commission to also allow trials as suggested by AT&T, where multiple technology transitions to all-IP networks would be occurring simultaneously.⁶ Such comprehensive "stress tests" would provide a more accurate picture of the likely scenarios that will play out in the real world as the various transitions occur in parallel, rather than serially.

ADTRAN thus urges the Commission to adopt AT&T's proposal for comprehensive trials in a limited number of geographic areas. Such experimentation would better serve the

⁵ *Public Notice* at pp. 3-10.

⁶ *Public Notice* at p. 2.

public interest than solely allowing the “single-purpose” trials suggested in the *Public Notice*.

Respectfully submitted,

ADTRAN, Inc.

By: _____/s/
Stephen L. Goodman
Butzel Long Tighe Patton, PLLC
1747 Pennsylvania Ave, NW, Suite 300
Washington, DC 20006
(202) 454-2851
SGoodman@bltplaw.com
Counsel for ADTRAN, Inc.

Dated: July 9, 2013